

EXHIBIT A

COMMONWEALTH OF VIRGINIA



DANVILLE CIRCUIT COURT
Civil Division
401 PATTON STREET PO BOX 3300
DANVILLE VA 24541
(434) 799-5168

Summons.

To: THE SALVATION ARMY
CT CORP SERVICE, REG AGENT
4701 COX ROAD
SUITE 285
GLEN ALLEN VA 23060

Case No. 590CL20000705-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, August 03, 2020

Clerk of Court: GERALD A. GIBSON

by


(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name:

SHELTON, BRENT A
219 PATTON STREET
HAYMORE & HOLLAND
DANVILLE VA 24541

COMMONWEALTH OF VIRGINIA



DANVILLE CIRCUIT COURT
Civil Division
401 PATTON STREET PO BOX 3300
DANVILLE VA 24541
(434) 799-5168

Summons

To: TRICKA DENISE JACKSON
618 FALL CREEK ROAD
RINGGOLD VA 24586

Case No. 590CL20000705-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

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Clerk of Court: GERALD A. GIBSON

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(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: SHELTON, BRENT A
219 PATTON STREET
HAYMORE & HOLLAND
DANVILLE VA 24541

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF DANVILLE

LEONARD WALTON,

Plaintiff

v.

TRIKA DENISE JACKSON,

Defendant,

AND

THE SALVATION ARMY

Defendant

Serve Registered Agent:
CT Corporation System
4701 Cox Road, Suite 285
Glen Allen, VA 23060

COMPLAINT

CL20-705

20 JUL 31 PM 3:20
CLERK OF COURT
CITY OF DANVILLE
JUL 31 2020

FILED

TO: THE HONORABLE JUDGE OF SAID COURT:

COMES NOW LEONARD WALTON by and through counsel, and moves the Court for judgment against the Defendant, TRIKA DENISE JACKSON and THE SALVATION ARMY, and for his Complaint, states as follows:

1. On December 8, 2016, at approximately 12:45 p.m., Leonard Walton ("Plaintiff") was the driver of a vehicle, stopped at a red light heading south on Piedmont Drive at the intersection of Park Avenue in the City of Danville, Virginia.
2. At the same time and place aforesaid, Trika Denise Jackson ("Defendant Jackson") was operating a vehicle owned by The Salvation Army ("Defendant

Salvation Army") while in the course of her employment for The Salvation Army.

3. At the same time and place aforesaid, the weather was clear and dry.
4. Defendant Jackson was traveling south on Piedmont Drive toward Park Avenue.
5. Defendant owed a duty to Plaintiff to operate and control her vehicle with reasonable care.
6. As Defendant Jackson approached the red light on Piedmont Drive, Defendant Jackson crashed into the rear of Plaintiff's vehicle. Defendant Jackson then proceeded to hit Plaintiff's vehicle a second time as Defendant attempted to maneuver her vehicle around Plaintiff's vehicle.
7. Upon both impacts, Plaintiff was thrown about the vehicle with force causing injuries.
8. Defendant Jackson negligently breached her duty to Plaintiff to operate and control the vehicle with reasonable care. Defendant's negligent acts included, but were not limited to:
 - (A) failing to reduce speed;
 - (B) failing to keep proper attention;
 - (C) driving in a reckless and careless manner;
 - (D) failing to keep a proper lookout for vehicles lawfully operating in the vicinity;
 - (E) failing to have proper regard for the persons and property of others so situated; and

(F) failing to keep proper control of the vehicle.

9. Defendant Salvation Army, as an employer of Defendant Trika Denise Jackson, is responsible for any negligent acts committed by its employees under the theory of Respondeat Superior.
10. Under Respondeat Superior, Defendant Salvation Army had a duty to ensure its employees acted in a reasonable manner, free from negligence, so as not to endanger others.
11. In breach of this duty, the employee of Salvation Army negligently and carelessly struck Plaintiff's vehicle.
12. As a proximate cause of Defendant's negligence, Plaintiff suffered serious and permanent physical injuries, including a strain of the muscle, intervertebral disc displacement of the lumbar region, radiculopathy, has undergone extensive physical therapy and chiropractic treatment; suffered from pain, stiffness, decreased mobility and mental anguish; and incurred medical bills exceeding \$32,000.00 in an effort to be cured of said injuries.
10. That your plaintiff, Leonard Walton, was free from any negligence or fault whatsoever regarding said collision and did not assume the risk of the aforesaid injuries she sustained from said collision.
11. That your plaintiff reserves the right to amend this Complaint to increase the *ad damnum* clause if further investigation and discovery shows that the damages claimed are in excess of the amount sued for.

WHEREFORE, your Plaintiff, Leonard Walton, respectfully requests that judgment be entered against the Defendants, Trika Denise Jackson and The Salvation Army, in the amount of \$250,000, plus costs expended herein and interest from December 8, 2016, and that he be awarded all such further relief as is just.

A trial by jury is demanded pursuant to Rule 3:21 of the Supreme Court of Virginia.

Respectfully submitted,

LEONARD WALTON

By Counsel

Counsel:

HAYMORE & HOLLAND, P.C.
219 Patton Street
Danville, VA 24541
Telephone: 434/793-8378
Facsimile: 434/793-8886
brent@haymorehollandlaw.com

By: 

Brent A. Shelton
VSB #92518